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CENTRAL FAX CENTER

JUL 28 2006

Attorney Docket No. 032810-1000

Application Serial No. 09/828,158

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REMARKS

Claims 1-20 are pending in the present application. Claims 1, 2, 11, and 16 have been amended to further claim the invention. Pursuant to these amendments and arguments therewith, claims 1-20 are believed to be in condition for allowance.

Applicant thanks the Examiner for the April 4, 2005 Office Action and for reconsidering and withdrawing some of the earlier 35 U.S.C. §103 rejections of the claims in the prior Office Action.

In the instant Official Action, claims 1-10 are now rejected under 35 U.S.C. §103(a) as being unpatentable over the message routing system set forth in U.S. Patent No. 6,675,507 to Bobo II (hereinafter "Bobo '507"), cited previously, in view of newly-cited U.S. Patent Number 5,860,074 to Rowe. Claims 11-13, 15-18, and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Bobo '507 in view of U.S. Patent Number 6,350,066 to Bobo (hereinafter "Bobo '066"). Lastly, claims 14 and 19 were rejected under §103(a) over Bobo '507 in view of Bobo '066 and in further view of newly-cited Rowe.

Applicant again thanks the Examiner for the comprehensiveness of his rejections and reasons therefor. Referring to the particular rejections in the Office Action, claims 1-10 were rejected under 35 U.S.C. §103(a) as being unpatentable for obviousness over Bobo '507 in combination with and in view of Rowe. Applicant respectfully disagrees with this proposed combination, suggestion and rejection for the reasons set forth hereinbelow. The deficiencies of Bobo '507 as a reference, primary or otherwise, are also set forth in Applicant's prior Response.

In particular, Bobo '507 states that the incoming document *in its entirety* is sent to the user *both in full size and in reduced size*, creating two HTML images for each page. (See Figure 4A; see also Col. 9, lines 18-29 and col. 9, line 66 to col. 10 line 14; Claims 21 and 23, emphasis added). However, Applicant respectfully submits that Bobo '507 fails to disclose, teach, or suggest creating a single file of all thumbnail images, as is presently recited in Applicant's claims 1 and 2, as amended. (See Applicant's patent application, page 11, lines 10-15). Further, Applicant notes that Bobo '507 is entirely directed to systems that forward telephonic messages and facsimiles within a message storage and delivery system (MSDS). Clearly, one skilled in the art would not look to a system that is solely directed to forwarding telephonic messages and facsimiles when solving the problem the present invention, i.e., provide an improved system and methodology for the storage and manipulation of stored documents. Indeed, the deficiencies of Bobo '507 are manifest.

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Rowe generally describes problems encountered in transmitting electronic documents, e.g., font renderings. Rowe generally describes a so-called "optimized" document file created from a non-optimized electronic document. Further, Rowe explicitly discusses allowing a host to download only a specific page of the document requested by the user without downloading other pages in the document through using the page offset information. (Col. 5, lines 59-65). On page 4 of the Office Action, it is alleged that Rowe teaches that "[a]dditional options provide for the downloading of only a selected page without downloading the remainder of the multi-paged document until requested (by selecting one of the previously displayed thumbnail icons)." Applicant respectfully disagrees with this assertion and contends that Rowe utterly fails to disclose, teach, or suggest the use of thumbnail images to download the full-image of a document. Specifically, Rowe discloses that the thumbnail images can be selected by a user, based on preference, for replacing the bookmark view. (Col. 12, lines 26-30). The bookmark view allows "a user to manipulate the *received* data and view the page according to user preferences." (Col. 11, lines 45-47) (emphasis added). Clearly, Rowe cannot be said to disclose, teach, or suggest the use of thumbnail images to be used for downloading the full-image as is recited in Applicant's claims 1 and 2, and fails to remedy the aforementioned deficiencies of Bobo '507 as a primary reference.

Accordingly, Applicant respectfully submits that the Bobo '507 and Rowe references, even when combined in the manner suggested, still fail to disclose, teach, or otherwise suggest the creation of thumbnail images in a single file to be used to download the full-image, as presently recited in Applicant's claims, particularly claims 1 and 2. Therefore, reconsideration and withdrawal of this rejection with respect to claims 1-10 are respectfully requested.

Referring again to the Office Action, claims 11-13, 15-18, and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bobo '507 in view of Bobo '066, the deficiencies of which as a reference have been addressed previously. Applicant respectfully disagrees with the Examiner's rejection for the reasons set forth hereinbelow. Indeed, Applicant notes that for the reasons set forth above regarding the irrelevance of the Bobo '507 reference, the Bobo '066 reference is deficient for the same reasons. In particular, on page 13 of the Office Action of April 4, 2006, it is asserted that Bobo '507 and Bobo '066 "both essentially claim the same invention." As stated above, Bobo '507 is directed to systems that forward telephonic messages and facsimiles within a message storage and

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delivery system. Clearly, combining two similar or nearly identical disclosures of inventions, neither of which addresses the problem addressed by the present invention, i.e., the storage and manipulation of stored documents and images, cannot sustain a *prima facie* case of obviousness under 35 U.S.C. §103(a).

The practical and visualization advantages of the present invention over Bobo et al. are manifest, and Applicant continues to be amazed at the failure of the cited references to disclose or suggest the present invention. Indeed, the disclosures of Bobo et al., directed to retrieving a stored document and converting the entire document into another format (or two), are entirely different than that of the claimed invention, directed to efficient retrieval of stored documents. Different focus, different concerns and different disclosures. Rowe, directed to downloading optimization, e.g., downloading one page of a multipage document, adds little to the overall paradigm of the Bobo references, rendering any combination thereof defective.

Addressing the merits of the Office Action further, independent claims 11 and 16, as amended, also recite a novel feature of the present invention, as recited in independent claim 1, including at least one document containing a plurality of images, a first of said images being a full image and the remainder of said plurality of images being a single file of thumbnail images. For the same reasons as stated above, Applicant contends that the Bobo references fail to disclose, teach, or suggest the novel features of the present invention.

Additionally, the Bobo references recite that facsimile messages undergo signal processing so that the images of the facsimile are converted from a two tone black and white image into a grayscale image. (Col. 19, lines 5-8). Neither Bobo reference discloses, teaches, or otherwise suggests the creation of thumbnail representations of each image with a single document, as is recited in Applicant's claims 11 and 16, as amended. Clearly, the conversion of files from one format to another, as set forth in Bobo '507, for example, at Col. 19, lines 13-16, is not even remotely similar to the creation of a single image document comprising multiple thumbnail representations, as recited in Applicant's amended claims.

Furthermore, although the Examiner asserts that Bobo '507 fails to teach a system journal as recited in Applicant's independent claims 11 and 16, an attempt is made to combine Bobo '066 to cure the deficiencies of Bobo '507. In the specification of Bobo '066, it describes that an object of the invention therein is to track and record correspondence. (Col. 5, lines 29-31). However, Bobo '066 fails to disclose, teach, or otherwise suggest that a system journal logs and tracks *functions* performed by the document image management system, as is recited in Applicant's claims 11 and 16. Applicant respectfully submits that

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combining two references that are in a divergent field from the present invention, said references lacking any similarities in functioning to the present invention, fails to establish a *prima facie* case of obviousness. Indeed, Applicant respectfully submits that one skilled in the art cannot be said to look in an entirely different field of prior art as the present invention, discover two references solving a completely different problem, and combine them to create the present invention. Therefore, reconsideration and withdrawal of the rejection of claims 11-13, 15-18 and 20 are respectfully requested.

Referring again to the Office Action, claims 14 and 19 were rejected under 35 U.S.C. §103(a) over Bobo '507 in view of Bobo '066 and in further view of Rowe. Further to the arguments above, Applicant respectfully disagrees with this rejection and contends that the cited references fail to disclose, teach, or otherwise suggest the present invention. Accordingly, in view of the dependency of claims 14 and 19 from independent claims 11 and 16, respectively, and including all of the limitations thereof, Applicant respectfully submits that these claims likewise distinguish over the cited references and are in condition for allowance.

Applicant respectfully submits that the Bobo references and Rowe, alone or in combination, fail to render the instant invention, as claimed, unpatentable. The Bobo references, directed to very different technological concerns than those of the claimed invention, do not render the present claims, particularly as amended, obvious because of some general similarity in handling data. The entire specifications, figures and claims of the Bobo references are directed solely to message routing, and Rowe, directed to downloading optimization options, fails to cure the many deficiencies of the Bobo references, including the primary reference cited, Bobo '507. Therefore, reconsideration and withdrawal of the rejection of claims 14 and 19 are respectfully requested.

Accordingly, Applicant respectfully submits that the claimed inventions, i.e., claims 1-20, are allowable over the cited references. Applicant thus requests that all the rejections of claims 1-20 under 35 §U.S.C. 103(a) be reconsidered and withdrawn.

Conclusion

In view of the above amendments and remarks, Applicant respectfully requests the Examiner's reconsideration of this application and the timely allowance of the pending claims. An early and favorable Notice of Allowance is respectfully solicited. In the event that the Examiner is of the opinion that a brief telephone or personal interview will facilitate

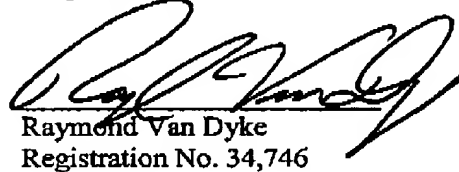
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allowance or advancement of the case on the merits, the Examiner is courteously requested to contact Applicant's undersigned representative.

Respectfully submitted,



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